

LETTERS OF APPEAL

JUNIPER RIDGE LANDFILL ADVISORY COMMITTEE

230 West Old Town Road

Old Town, Maine 04468

July 6, 2010

Michael T. Parker

Bureau of Remediation and Waste Management

Department of Environmental Protection

17 State House Station

Augusta, Maine 04330-0017

Dear Mr. Parker

Re: Treated Biomedical Waste # S-020700-WU-AJ-N

From the two meetings held regarding the Treated Biomedical Waste from Associated Health Resources, Inc located in Pittsfield, Maine our Advisory Committee would like to show our grounds for appeal of your department order dated June 30, 2010.

Our Grounds are as follows.

- a) **Excessive Amount**-Previously the Pine Tree Landfill in Hampden was approved for 2,000 tons per year and at no time had AHR quantities exceeded the license restrictions. Therefore the request for 5,000 tons appears to be excessive.
- b) **JRL Out of State Waste**-As noted in the AHR application, only 34.9% of the waste is generated within the State of Maine. Therefore 65.1 % is Out Of State Waste which we believe does not meet the criteria of 38MRSA 1310 – (11), processed solid waste to render the waste suitable for beneficial use in accordance with the standards of Chapter 41 “Residue and bypass generated by incineration, processing and recycling facilities with the State.” THE INTERPRETATION OF THIS STATEMENT APPEARS TO BE EXTREMELY LIBERAL, AS THE AHR PROCESS DOES NOT CREATE ANY RESIDUE BY-PASS, ONLY TREATS AND COMPACTS THOSE QUANTITIES THAT ARE INITIALLY ACCEPTED AT THE FACILITY.

- c) **Interstate Commerce Rules**-As for the application of the Interstate Commerce Rule, we are not restricting Out of State participation only that AHR address the needs of the Maine Medical Facilities first. The only control that we (State of Maine) as owners of the landfill have to restrict Out of State waste is to limit Volumes.

In Conclusion—We are asking that the license be amended to 3,000 ton/year to accommodate current and future needs of our Maine Institutions.

Sincerely



Peter Dufour, Chariman

Juniper Ridge Landfill Advisory Committee

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